

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:	
<i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF CARMEN BRIDGEFORTH

I, Carmen Bridgeforth, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship, which includes my full birth name of Carmen Delia Morales.
3. On September 11, 2001, I was working for the Port Authority of New York and New Jersey at the World Trade Center Towers when the terrorist attacks occurred.
4. I was working as part of the cafeteria staff along with my husband David Allen Bridgeforth (he was a cook in the cafeteria kitchen) on the 43rd floor of the North Tower when the first plane hit the tower. I was standing in front of my register between two steel bars that separate the customers from the cashiers, when I felt this bang. The tower swayed back and forth and I was thrown against the steel bar on the left side and then thrown back and hit the steel bar on the right

side. The lights went off and I saw a huge fireball and a person falling. I then ran to get my husband, David, but when I arrived in the kitchen area, I saw that he had suffered from severe burns (later categorized as fourth-degree burns) when the grill in the food preparation area had crushed his legs following the impact of the plane hitting the tower. At the time of the impact, my youngest son had also just left the cafeteria moments before the attack, and I did not know whether he was alive or not until I was able to escape the burning building and receive word that he was safe.

5. As I made my way down the 43 flights of stairs with my husband, I was slipping and falling, which caused me to injure both of my knees and I also twisted my back. As we ran down the stairways with masses of other people trying to escape the carnage, we only saw people who were badly burned and in flames, so we struggled to find an alternative route of escape. On the 20th floor, the exit door was locked and we were forced to back track up the stairs and find another exit. As we were finally able to exit the building, we saw bodies splattered on the ground and body parts all over the outside of the building. I still can recall the fearful looks on the young firefighters' faces as they ran in the opposite direction towards danger.

6. Outside of the tower, I watched as people jumped from the buildings to their imminent deaths and watched their bodies hit the ground. I ran for my life as the South Tower collapsed and I was cloaked in a cloud of black dust and smoke and pelted with debris from the building. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

7. We ran but we were blinded by the dark black smoke and debris. I ran into what I later realized was a truck, severely hurting my head and back. As we continued to run, my husband

fell backwards and dragged me with him to the ground, which injured my shoulder. We continued to run through the smoke and debris, banging into doors, walls and other objects as we made our escape from the area. We finally made our way into a drug store, where we received help from some of the store employees.

8. I was transported to Brooklyn Hospital on September 11, 2001 following the terrorist attacks. In the days, months, and years following these attacks, I continued to seek medical treatment with various providers for my 9/11 injuries. My health is currently being monitored through the World Trade Center Health Registry and I continue to see a doctor for my respiratory conditions on a frequent basis. As a result of these terrorist attacks, I suffered the following specific injuries: Post traumatic brain syndrome with cognitive dysfunction, cervical spine disorder, cervicdorsal derangement, lumbar derangement, lumbarosacral derangement, bilateral shoulder derangement, bilateral ankle derangement, head trauma, bilateral knee and leg sprain, vertigo, memory impairment, toxic bronchopneumonitis due to fume inhalation, and severe smoke and dust inhalation, which has caused me to suffer from painful nodules in my sinuses and chronic respiratory issues.

9. I also suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from adjustment reaction with depression and anxiety due to the traumatic events of these terrorist attacks. Additionally, the terrorist attacks on September 11th took the lives of eighty-seven of my close friends and colleagues. While I feel blessed that my family and I survived these horrific attacks, I continue to suffer from severe emotional distress and bouts of depression due to the traumatic events that I was forced to witness that day and the lasting effects that these attacks have had on my physical and mental health.

10. Attached as Exhibit B to this Declaration is a true and correct copy of my select, relevant medical records related to the treatment that I received following the September 11th terrorist attacks. Please note that at the time of these attacks, my full name was Carmen Quinones, which is also the name listed on many of my medical records.

11. I previously pursued a claim (Claim Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on 9/11, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 14th day of January 2020.


Carmen Bridgeforth

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**